

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FEDERAL HOUSING FINANCE AGENCY,
AS CONSERVATOR FOR THE FEDERAL
NATIONAL MORTGAGE ASSOCIATION
AND THE FEDERAL HOME LOAN
MORTGAGE CORPORATION,

Plaintiff,

-against-

HSBC NORTH AMERICA HOLDINGS
INC., HSBC USA INC., HSBC MARKETS
(USA) INC., HSBC BANK USA, N.A., HSI
ASSET SECURITIZATION CORP., HSBC
SECURITIES (USA) INC., NEAL
LEONARD, GERARD MATTIA, TODD
WHITE, and JON VOIGTMAN,

Defendants.

No. 11 Civ. 6189 (DLC)

**NOTICE OF MOTION FOR PLAINTIFF FHFA'S MOTION TO EXCLUDE THE
OPINION AND TESTIMONY OF DEFENDANTS' EXPERT WALTER N. TOROUS**

PLEASE TAKE NOTICE that Plaintiff Federal Housing Finance Agency ("FHFA"), as Conservator for the Federal National Mortgage Association and the Federal Home Loan Mortgage Corporation, by its attorneys, Quinn Emanuel Urquhart & Sullivan, LLP, upon the Declaration of Jordan A. Goldstein, dated August 27, 2014, and the exhibits attached thereto; and Plaintiff FHFA's Memorandum in Support of Its Motion to Exclude the Opinion and Testimony of Defendants' Expert Walter N. Torous, hereby moves before this Court for an Order excluding the opinion and testimony of Defendants' expert Walter N. Torous, and for such other and further relief as the Court may deem just and proper.

DATED: New York, New York
August 27, 2014

By: /s/ Philippe Z. Selendy
Philippe Z. Selendy
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